

**GREENBAUM, ROWE, SMITH & DAVIS LLP**

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Estate, L.P.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

FAMECO REAL ESTATE, L.P.,

Plaintiff,

v.

TYLER BENNETT, DANIEL SPECTOR,  
WINICK REALTY GROUP LLC, and  
WINICK REALTY GROUP LLC NJ

Defendants.

Civil Action No. 3:12-cv-06102  
(JAP) (TJB)

**NOTICE OF MOTION FOR EXPEDITED  
DISCOVERY**

**TO:** Matthew K. Blaine, Esq.  
Lomurro, Davison, Eastman and Munoz, P.A.  
100 Willow Brook Road  
Suite 100  
Freehold, NJ 07728

**PLEASE TAKE NOTICE** that pursuant to the Court's Order on Request for leave dated November 7, 2012, the undersigned attorneys for plaintiff Fameco Real Estate, L.P. will move before the Honorable Tonianne J. Bongiovanni, U.S.M.J., United States District Court, District of New Jersey, at Clarkson S. Fisher Federal Bldg. & U.S. Courthouse, Trenton, New Jersey on December 3, 2012 at 9:00 a.m., or as soon thereafter as counsel

may be heard, for the entry of an Order, pursuant to Fed. R. Civ. P. 26(d), granting plaintiff leave to conduct discovery on an expedited basis

**PLEASE TAKE FURTHER NOTICE** that moving counsel will rely upon the accompanying Declaration of Michael Levin, Memorandum of Law, and proposed discovery demands.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**GREENBAUM, ROWE, SMITH & DAVIS LLP**  
Attorneys for Plaintiff Fameco Real  
Estate, L.P.

By: /s/ Eric Tunis  
ERIC TUNIS

Dated: November 9, 2012